

To: Derrick Williams, Program Manager, Dept. of Natural Resources Response and Remediation Program

Dear Mr. Williams,

I've attended two zoning meetings in St. Marys, GA and I'm confused by the lack of information our community leaders offer regarding the Georgia Voluntary Brownfield Program as it applies to the 720 acre paper mill site surrounded by wetlands. I understand that the Voluntary Brownfield Program benefits the economic base because it provides the purchaser tax incentive as well as some preventing liability from being sued for human health and environmental degradation. I know that Georgia's Brownfield Program has been successful in the redevelopment of dozens of sites in Georgia. Apparently, it relieves a developer from liability for ground water clean-up.

I'm unaware of any involvement by the Georgia DNR Response and Remediation Program. The site has been identified by Landmar as qualified for the Hazardous Site Reuse and Redevelopment Act. The prospective purchaser, Mr. Ragucci, and his lawyer haven't mentioned that it is in *Hazardous Site Inventory*. Is this property on such a list? If not, I believe it should be, because we've been told it will never be suitable for residential development, for which it is now zoned. I believe that the residents of St. Marys have a right to know how toxic the area is before any hazardous soil or ground water is moved or released into the environment.

I do not know if there is currently a corrective action plan, which Landmar offered or if there's an official sampling and monitoring of toxins. Is there an Environmental Covenant which would restrict this contaminated property from being dredged, further disturbing the fragile marshlands? The prospective purchaser indicated that industry will use the well water for manufacturing, however what proof is there that the water isn't contaminated with chemicals which will remain in the products? What is a Type 5 restriction; has this property been evaluated by the Hazardous Site Response Program or by CERCLA (Comprehensive Environmental Response Compensation and Liability Act) at the State level? I know there are 3 Federal Superfund Sites in Glynn County. If the Brownfield Act relieves a qualified developer from liability for ground water clean-up, isn't redevelopment of the blighted area dangerous to those humans who drink their well water? Wildlife and marine life also take the hit; consumption of PCB contaminated fish should be monitored.

Is there a Brownfields Covenant Not to Sue Agreement at the expense of the health of Camden County? Is there a public and environmental health agency oversight on this project?

All the exhibits I've seen on the City Manager's plan relates to the economic revitalization of the community. Healthy wetlands and rivers and ground water can't be purchased. I hope and pray that the State of Georgia Department of Natural Resources will help us protect and preserve our fragile marine ecosystem.

Respectfully,

Stephanie D. Bowen
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